



Ed Harrington, General Manager  
San Francisco Public Utilities Commission (SFPUC)  
1155 Market Street, 11th Floor  
San Francisco, CA 94103

Friday, March 26, 2010

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Dear Mr. Harrington,

Thank you for the letter you sent on March 10, 2010 to the Center for Food Safety and the Organic Consumers Association. Since the two letters were identical, we are responding jointly.

As you note, we have called upon the city of San Francisco to stop applying toxic sewage sludge onto private and public lands. Your deceptive program of packaging sewage sludge as "organic compost" and giving it to unsuspecting gardeners has rightfully provoked dismay and anger among the Bay Area's gardeners and citizens as was manifested in the public protest at Mayor Newsom's offices on March 4.

Furthermore, we object to your use of the invented PR term "biosolids" to promote what is a nationwide scam perpetrated by the sewage sludge industry. You are talking about sewage sludge, and we will continue to call sewage sludge by its correct name, sewage sludge, not by a euphemism that is the result of a public relations contest held within the sewage sludge industry to come up with a name that would deceive the public. (1.)

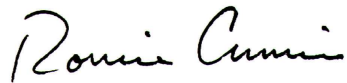
Yes, the Center for Food Safety initiated a very limited pilot test program on only one small sample of the tons of toxic sludge you gave away. And, yes, as was accurately reported by Channel Five CBS News, even this very limited test confirmed the presence of unregulated hazardous materials in your sewage sludge. Our two non-profit organizations cannot afford the very expensive testing that would be necessary to even begin to identify the thousands of toxic contaminants and pathogens present in sewage sludge of the sort you are giving away. But, as manager of the San Francisco Public Utilities Commission, you surely know that the EPA has found that dozens of hazardous materials - not regulated and not required to be tested for - have been documented in each and every one of the sludge samples EPA took around the USA. (2.)

When you, the entity that has given away tons of sewage sludge contaminated by hazardous materials from nine California counties, make available to the public complete test results for all the hazardous materials present in this sludge, we will also release the results of our very limited testing. In short, due diligence requires that you perform this testing and make it available to the public.

ORGANIC CONSUMERS ASSOCIATION  
6771 S. SILVER HILL DRIVE - FINLAND, MN 55603 USA - 218-226-4164  
www.organicconsumers.org - email: office@organicconsumers.org - 218-353-7652 fax

Finally, it is the ethical and legal responsibility of the SFPUC and the city of San Francisco to conduct cleanup and remediation of the gardens that received your sludge under false pretenses. You know that if you had attempted to give away truthfully labeled sewage sludge for use in gardens where children play and where food is grown, the public would have adamantly refused and would certainly not have accepted your "gift" of tons of toxic sewage sludge. (3.) Indeed, this is why the sewage sludge industry has for decades gone to such great lengths in its effort to promote toxic sludge as "fertilizer," and "land application" as "recycling": first by disguising the very idea of sewage sludge with the fabricated green-sounding euphemism "biosolids," and now by usurping from the organic gardening and farming movement such revered words as "compost" and "organic" itself. This is really a toxic disposal program masquerading as "environmental recycling." We demand you end it and clean up the pollution you have created.

Sincerely,



Ronnie Cummins,  
Organic Consumers Association

"/s/"

Andrew Kimbrell,  
Center for Food Safety

Citations:

- 1.) See the 1995 book Toxic Sludge Is Good for You!  
By John Stauber and Sheldon Rampton. <http://www.sourcewatch.org/index.php?title=Biosolids>
- 2.) Targeted National Sewage Sludge Survey results are described in two EPA reports that together constitute the TNSSS: EPA-822-R-08-016 and EPA-822-R-08-018.  
<http://epa.gov/waterscience/biosolids/tssss-overview.html>  
Published by EPA, January 2009.
- 3.) For instance, imagine the public reaction if even an industry document such as this one had been supplied during the sewage sludge give-away, replete with some of the general sludge exposure warnings provided to sludge and sewage workers. See the document titled: National Biosolids Partnership, Waste Water and Biosolids Worker Health and Safety - Frequently Asked Questions, <http://www.biosolids.org/news.asp?id=1415> , July, 2002.

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